

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:  
  
ALL CASES

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN  
SUPPORT OF PLAINTIFFS' LIST OF  
DISPUTED ENTRIES FOR SPECIAL  
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in  
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing  
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for  
6 Master Review on May 13, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for  
8 Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs  
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries  
10 was challenged. The Brief included the general background of the privilege dispute process to  
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a  
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Master Review Plaintiffs provided on May 13,  
14 2025, contained an entry still in dispute from Defendants' March 14, 2025, and March 24, 2025,  
15 privilege log.

16 **March 14, 2025, Privilege Log**

17 5. Defendants included 1,523 entries on its March 14, 2025, privilege logs.

18 6. Plaintiffs sent Defendants a challenge letter on March 20, 2025, challenging 108  
19 of these 1,523 entries.

20 7. On April 3, 2025, Plaintiffs provided the Master and Defendants with a list of 357  
21 entries in dispute from Defendants' March 14, 2025, and March 24, 2025, privilege logs,  
22 designated "Attachment B." 74 entries from Attachment B were from Defendants' March 14,  
23 2025, privilege log.

24 8. On May 1, 2025, the Honorable Judge Jones set forth deadlines related to  
25 Attachment B.

26 9. On May 5, 2025, Plaintiffs provided the Master and Defendants with an updated  
27 Attachment B containing 165 entries remaining in dispute. 32 entries from the updated  
28 Attachment B were from Defendants' March 14, 2025, privilege log.

1           10.     On May 8, 2025, Defendants provided Plaintiffs with a list of five entries where  
2 Defendants downgraded their privilege claim.

3           11.     To date, Defendants have withdrawn their privilege claim to one entry in full and  
4 21 entries in part.

5           12.     On May 9, 2025, Plaintiffs provided the Master and Defendants with a final  
6 Attachment B containing 143 entries remaining in dispute, noting 9 entries with redaction issues.  
7 30 entries from the final Attachment B were from Defendants' March 14, 2025, privilege log.

8           13.     On May 13, 2025, Plaintiffs provided an updated final list following the resolution  
9 of the outstanding redaction issues noted on the May 9, 2025 list, removing 6 entries. This left 28  
10 entries in dispute from Defendants' March 14, 205 privilege log.

11           **March 24, 2025, Privilege Log**

12           14.     Defendants included 2,745 entries on its March 24, 2025, privilege logs.

13           15.     Plaintiffs sent Defendants a challenge letter on March 31, 2025, challenging 283  
14 of these 2,745 entries.

15           16.     On April 3, 2025, Plaintiffs provided the Master and Defendants with a list of 357  
16 entries in dispute from Defendants' March 14, 2025, and March 24, 2025, privilege logs on  
17 Attachment B. 283 entries from Attachment B were from Defendants' March 24, 2025, privilege  
18 log.

19           17.     On May 5, 2025, Plaintiffs provided the Master and Defendants with an updated  
20 Attachment B containing 165 entries remaining in dispute. 133 entries from the updated  
21 Attachment B were from Defendants' March 24, 2025, privilege log.

22           18.     On May 8, 2025, Defendants provided Plaintiffs a list of 5 entries where  
23 Defendants downgraded their privilege claim.

24           19.     To date, Defendants have withdrawn their privilege claim to 18 entries in full and  
25 50 entries in part.

26           20.     On May 9, 2025, Plaintiffs provided the Master and Defendants with a final  
27 Attachment B containing 143 entries remaining in dispute, noting 9 entries with issues. 113  
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1 entries from the final Attachment B were from Defendants' March 24, 2025, privilege log.

2 21. On May 13, 2025, Plaintiffs provided an updated final list following the resolution  
3 of the outstanding redaction issues noted on the May 9, 2025, list, removing 6 entries. This left  
4 109 entries in dispute from Defendants' March 44, 205 privilege log.

5 22. On May 15, 2025, Plaintiffs agreed to remove their challenge to entry  
6 JCCP\_MDL\_PRIVLOG077307.

7 Executed this 16th day of May 2025 in Detroit, Michigan.

8  
9 /s/ Tiffany R. Ellis

10 Tiffany R. Ellis  
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